



CALIFORNIA ISO

California Independent
System Operator

July 5, 2002

Federal Communications Commission
Office of the Secretary
1919 "M" Street, NW, Room 222
Washington, DC 20554

SUBJECT: Notice of Proposed Rule Making to Allocate 135.7-137.8 kHz
Bands to Amateur Operation

Director of Operations:

We have been informed that the FCC has released a Notice of Rule Making proposing to allocate frequency bands of 135.7-137.8 kHz to amateur radio service on a secondary basis.

The electric transmission network in California depends on uninterrupted radio frequencies from 30 to 500 kHz bandwidth. The issuance of a permit to operate within this range may cause interference with protection systems of the electric power grid, and may seriously impact electric power transmission system reliability and integrity. The safety impact and expense associated with the inappropriate operation of protection devices due to interference may be costly.

The California ISO recommends that this issue be fully investigated before allocating frequency bands between 135.7-137.8 kHz to the amateur radio service. The California ISO does not support any frequency reallocation that might compromise the reliability of the transmission grid.

If you need further information, please contact me at (916) 351-2123.

Sincerely,

A handwritten signature in black ink, appearing to read "Jim Detmers", is written over the typed name and title.

Jim Detmers
Vice President
Grid Operations

bcc: Shan Bhattacharya – PG&E
Jeff Butler – PG&E
Simon Chiang – PG&E
Roger Gray – PG&E
Rich Cashdollar
Tom French
Robin Smutny-Jones